

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of § 73.202(b)
Table of FM Allotments
(Rule, Texas)

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MM Docket No. 01-219
RM-10238

To: Chief, Allocations Branch
Policy and Rules Division, Mass Media Bureau

REPLY COMMENTS OF FUCHS RADIO, INC.

Fuchs Radio, Inc. ("Fuchs"), by its attorneys and pursuant to Sections 1.415 and 1.420 of the Commission's rules, hereby submits its reply comments in the above-captioned proceeding for the allotment of Channel 253A at Rule, Texas. Fuchs is the licensee of KTIJ(FM), Channel 253C, Elk City, Oklahoma. After the comment date in this proceeding had passed, Fuchs became aware of an error in the Commission's FM database with respect to the licensed coordinates of KTIJ. Specifically, the database incorrectly listed the station's latitude as 35° 58' 39" N. In fact, the correct latitude is 34° 58' 39" N. Fuchs contacted the FCC's Audio Services Division staff upon learning of this error, and the FM database now contains the correct coordinates. Attached hereto as Attachment 1 is a copy of the KTIJ license, which was reissued on November 1, 2001, to reflect this correction. Using the correct coordinates, the proposed co-channel allotment at Rule, Texas, is short-spaced to KTIJ, as demonstrated by the attached channel study attached hereto as Attachment 2. Accordingly, Fuchs submits that

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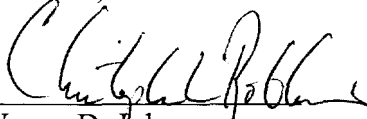
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Channel 253A may not be allotted to Rule, Texas, as currently proposed in the above-captioned proceeding.

Respectfully submitted,

FUCHS RADIO, INC.

By:


Wayne D. Johnsen /

Christopher L. Robbins

of

WILEY REIN & FIELDING LLP

1776 K Street, NW

Washington, DC 20006

(202) 719-7000

Its Attorneys

November 6, 2001

ATTACHMENT 1



United States of America
FEDERAL COMMUNICATIONS COMMISSION
FM BROADCAST STATION LICENSE

Authorizing Official:

Official Mailing Address:

FUCHS RADIO, INC.
1515 N. BROADWAY
HOBART OK 73651

James D. Bradshaw
Assistant Chief
Audio Services Division
Mass Media Bureau

Grant Date: May 18, 2000

Facility Id: 70631

Call Sign: KTIJ

This license expires 3:00 a.m.
local time, June 01, 2005.

License File Number: BLH-19990727KC

This authorization re-issued 01 November 2001 to reflect a correction in coordinates.

Subject to the provisions of the Communications Act of 1934, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this license, the licensee is hereby authorized to use and operate the radio transmitting apparatus herein described.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve the public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequency designated in the license beyond the term hereof, nor in any other manner than authorized herein. Neither the license nor the right granted hereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934. This license is subject to the right of use or control by the Government of the United States conferred by Section 606 of the Communications Act of 1934.

Callsign: KTIJ

License No.: BLH-19990727KC

Name of Licensee: FUCHS RADIO, INC.

Station Location: OK-ELK CITY

Frequency (MHz): 98.5

Channel: 253

Class: C

Hours of Operation: Unlimited

Transmitter: Type Accepted. See Sections 73.1660, 73.1665 and 73.1670 of the Commission's Rules.

Transmitter output power: 20.0 kW

Antenna type: (directional or non-directional): Non-Directional

Description: SHI 6810-10

Antenna Coordinates: North Latitude: 34 deg 58 min 39 sec

West Longitude: 99 deg 24 min 35 sec

	Horizontally Polarized Antenna	Vertically Polarized Antenna
Effective radiated power in the Horizontal Plane (kW):	100	100
Height of radiation center above ground (Meters):	137	137
Height of radiation center above mean sea level (Meters):	823	823
Height of radiation center above average terrain (Meters):	332	332

Antenna structure registration number: 1209681

Overall height of antenna structure above ground (including obstruction lighting if any) see the registration for this antenna structure.

Special operating conditions or restrictions:

- 1 The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic fields in excess of FCC guidelines.

*** END OF AUTHORIZATION ***

ATTACHMENT 2


Channel 253C Elk City, OK
 (Using correct coordinates as reference)

34 58 39 N.	Class C	Search Date					
99 24 35 W.	Current rules spacings	10-19-01					
----- Channel 253 - 98.5 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin
KTIJ	253C	Elk City	OK	0.0	110.95	290.0	-179.05 *
RADD	253A	Rule	TX	193.3	205.87	226.0	-20.13 *
RADD	255C3	Chillicothe	TX	189.0	80.23	96.0	-15.77 *
RADD	255C3	Quanah	TX	201.9	81.25	96.0	-14.75 *
KACO.A	253C3	Ardmore	OK	109.0	226.79	237.0	-10.21 *
RADD	253A	Graham	TX	160.5	219.31	226.0	-6.69 *
KACO	253C3	Ardmore	OK	112.5	230.95	237.0	-6.05 *
RDEL	253C3	Ardmore	OK	112.5	230.95	237.0	-6.05 *
ALLO	254A	Seymour	TX	174.9	164.63	165.0	-0.37 *
RADD	253A	Graham	TX	161.9	225.90	226.0	-0.10 *
RADD	251A	Lawton	OK	109.3	95.37	95.0	0.37 *
KJNZ	251C1	Lawton	OK	113.9	105.82	105.0	0.82 *
RDEL	251C1	Lawton	OK	113.9	105.82	105.0	0.82 *
RADD	252A	Guthrie	TX	212.2	168.75	165.0	3.75 *
RADD	252C	Bridgeport	TX	134.2	246.42	241.0	5.42 *
RADD	250C3	Crowell	TX	195.5	116.58	96.0	20.58
KPRF	254C1	Amarillo	TX	275.6	234.59	209.0	25.59
ALLO	252C1	Kiowa	KS	20.2	241.08	209.0	32.08
KRDFFM	252A	Spearman	TX	310.8	209.23	165.0	44.23

CERTIFICATE OF SERVICE

I, Julie Drake, a secretary in the law firm of Wiley, Rein & Fielding do hereby certify that I have on this 6th day of November, 2001 caused a copy of the foregoing "Reply Comments of Fuchs Radio, Inc." to be served by first class mail, postage prepaid, upon the following:

Jeraldine Anderson
1702 Cypress Drive
Irving, TX 75061


Julie Drake